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JUN 29 1993  
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MEMORANDUM

TO: PAUL HARVEY, CASE MANAGER, BFCM  
FROM: JOHN PRENDERGAST, TECHNICAL COORDINATOR, BEERA *J 6/21/93*  
SUBJECT: FINAL FEASIBILITY STUDY, NL INDUSTRIES, INC. SITE,  
PEDRICKTOWN, NEW JERSEY, MAY 1993

A review of the Final Feasibility Study Report for the NL Industries site has been completed. Comments on the above referenced document are discussed below.

COMMENTS

1. Remedial Action Objectives, page ES-3

The FS Report states that the remedial action objectives for lead in soils is 500-1000 mg/kg. NJDEPE has established a residential cleanup number for lead of 100 ppm and a non-residential number of 600 ppm. Although these clean-up criteria are not promulgated standards, they are being applied as clean-up goals at other New Jersey sites. The NJ Soil Cleanup Criteria for lead as well as any other applicable soil cleanup criteria must be included in the Draft FS, and applied as cleanup goals for site soils.

2. Soils off NSNJ Property, page 6 para. 3

NL contends that Lead soil levels off the NL property average 114 ppm and range from 22.8 ppm to 685 ppm. In actuality, off-site soils within 200 feet of the NL property average approximately 200 ppm Lead in soil and range from 45 ppm to 685 ppm Lead in soils. As pointed out previously, NJDEPE requires the use of a 100 ppm soil cleanup number at all off-site areas where Lead exceeds 100 ppm in soil.

3. Identification and Screening of Remedial Technologies, pg. 41

All of the Remedial Alternatives presented for soils allow contaminated soil to remain at levels above the current DEPE Residential Direct Contact Soil Cleanup level of 100 ppm.